

EXHIBIT A

Robert C. Rowbotham, II, Esq. - I.D. No. 013852003
BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
1827 East Second Street
Scotch Plains, NJ 07076
Tel.: (908) 322-7000
Fax: (908) 322-6997
Attorney for Plaintiff, Eliza Zonn

ELIZA ZONN,

Plaintiff(s),

vs.

ARMANDO MACIASVALDEZ,
DE LA H TRUCKING, POINT DIRECT
TRANSPORT, INC., JOHN DOES 1-10
said names being fictitious) and XYZ
CORPORATIONS
1-10 (said names being fictitious),

Defendant(s),

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO.: ESX-L-2822-19

CIVIL ACTION

COMPLAINT, JURY DEMAND,
DEMAND FOR PRODUCTION OF
DOCUMENTS AND DEMAND FOR
ANSWERS TO INTERROGATORIES

Plaintiff, **ELIZA ZONN**, residing at 64 Hillyer Street in the City of Orange, County of Essex and State of New Jersey, by way of Complaint against defendants, **ARMANDO MACIASVALDEZ, DE LA H TRUCKING, POINT DIRECT TRANSPORT, INC., JOHN DOES 1-10** (said names being fictitious) and **XYZ CORPORATIONS 1-10** (said names being fictitious), says:

FIRST COUNT

1. On or about September 7, 2018, plaintiff, **ELIZA ZONN** was the operator of a motor vehicle which she was travelling eastbound on Interstate 280 near milepost 11.3 in the City of Orange, County of Essex and State of New Jersey.

2. At the above-mentioned time and place, defendant, **ARMANDO MACIASVALDEZ**, who resides at 9401 Tamarind Avenue, in the City of Fontana, County of San Bernardino and State of California was the operator of a motor vehicle traveling eastbound on Interstate 280 near milepost 11.3 in the City of Orange, County of Essex and State of New Jersey which was owned by the defendants, **DE LA H TRUCKING AND POINTDIRECT TRANSPORT, INC.**

3. At the above-mentioned time and place, defendant did so negligently own, operate, maintain and/or control his motor vehicle so as to cause his motor vehicle to collide with plaintiff's motor vehicle.

4. As a direct and proximate result of the negligence of the defendant as aforesaid, plaintiff has suffered and will in the future suffer much pain in mind and body, has incurred and will in the future incur expenses for medical care and treatment, has suffered and will in the future suffer economic loss, was unable and will in the future be unable to attend to her usual and customary activities and was caused to suffer permanent injury.

5. Plaintiff has obtained the requisite physician's Certification pursuant to Title 39. A copy of same is attached hereto.

WHEREFORE, plaintiff, **ELIZA ZONN**, demands judgment against defendants, **ARMANDO MACIASVALDEZ, DE LA H TRUCKING and POINTDIRECT TRANSPORT, INC.**, for damages together with interest, counsel fees and costs of suit.

SECOND COUNT

1. Plaintiff repeats and reiterates the allegations contained in the First and Second Counts of the Complaint as if set forth more fully at length herein.

2. Defendants, **JOHN DOES 1-10** (names unknown) and **XYZ CORPORATIONS 1-10** (names unknown), negligently owned, operated, maintained and/or controlled their motor vehicle so as aforesaid.

3. As a direct and proximate result of the negligence of the defendants as aforesaid, plaintiff has suffered and will in the future suffer much pain in mind and body, has incurred and will in the future incur expenses for medical care and treatment, has suffered and will in the future suffer economic loss, was unable and will in the future be unable to attend to his usual and customary activities and was caused to suffer permanent injury.

4. Plaintiff reserves the right to amend the Complaint to join these potentially culpable parties if discovery should reveal that said parties are in any way responsible for the injuries sustained by plaintiff.

WHEREFORE, plaintiff, **ELIZA ZONN**, demands judgment against defendants, **ARMANDO MACIASVALDEZ, DE LA H TRUCKING, POINTDIRECT TRANSPORT, INC., JOHN DOES 1-10** (said names being fictitious) and **XYZ CORPORATIONS 1-10** (said names being fictitious), for damages together with interest, counsel fees and costs of suit.

DESIGNATION OF TRIAL COUNSEL

ROBERT C. ROWBOTHAM, II is hereby designated as trial counsel pursuant to Court Rule 4:5-1.

JURY DEMAND

Plaintiff herein demands trial by jury as to all issues so triable.

DATED: April 12, 2019

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorneys for Plaintiff, Eliza Zonn


BY: ROBERT C. ROWBOTHAM, II

DEMAND FOR INSURANCE INFORMATION

Plaintiff hereby demands that defendant(s) set forth the name of any insurance carrier providing coverage for plaintiff's injuries, the policy number and the extent of liability limits.

DATED: April 12, 2019

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorneys for Plaintiff, Eliza Zonn


BY: ROBERT C. ROWBOTHAM, II

DEMAND FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rule 4:18-1, plaintiff hereby demands that defendant(s) produce the following documentation within thirty (30) days as prescribed by the Rules of Court. Additionally, please be advised that the following requests are ongoing and continuing in nature and defendant(s) is/are therefore required to continuously update their responses thereto as new information or documentation comes into evidence.

1. The amounts of any and all insurance coverage covering defendant including but not limited to primary insurance policies, secondary insurance policies and/or umbrella insurance policies. For each policy of insurance, supply a copy of the declaration page therefrom.

2. Copies of any and all documentation or reports, including but not limited to police reports, accident reports, ISO claim searches and/or incident reports, concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies or duplications of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches or other reproductions, descriptions or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, business, corporation, investigative authority or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to any contracts between the owner of the property or product involved in the incident in question and any of the parties involved in this matter.

6. Copies of any and all documentation, including but not limited safety manuals, statutes, rules, regulations, books, and/or industry standards which refer to, reflect or otherwise related to the incident in question or any potential defense to the action in question.

7. Copies of any and all discovery received from any other parties to the action in question.

8. Copies of all CIB searches and/or any other records demonstrating prior insurance claims submitted by the plaintiff for any matter, including workers' compensation claims,

personal injury claims, property damage claims or any other claims for medical treatment or bodily or any and all other insurance claims.

9. Copies of any and all medical information and/or documentation concerning the plaintiff in this matter whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

10. Copies of any and all records of any type subpoenaed by defendant or received from any other source concerning the plaintiff or the incident in question.

11. Any and all videotapes or moving pictures made of plaintiff and/or the subject matter of this accident.

12. Please be advised that the plaintiff hereby objects to the taking of any photographs, x-rays or other reproductions concerning the plaintiff or the plaintiff's injuries at the time of defense examination.

13. The entire file maintained by experts whom plaintiff intends to call at trial, including but not limited to any notes or draft reports, billing statements, x-ray films and/or other studies.

14. Set forth the name, publisher, date of publication and page reference of each test, article standard, manual, policy, procedure, directive book or writing of any kind which your experts relied upon in any way in formulating their opinion in this matter.

15. A copy of any and all statements provided by defendant concerning this accident. This includes copies of any and all statements, whether verbal, written or otherwise, provided to defendant's insurance company or any adjuster acting on behalf of that insurance company, or to any other party. This request is made pursuant to Pfender v. Torres, 336 N.J. Super. 379

(App.Div. 2001).

16. A copy of defendant's cell phone records from the date of the accident, defendant's cell phone number and cell phone service provider as of the date of this accident.

DEMAND FOR ANSWERS TO INTERROGATORIES

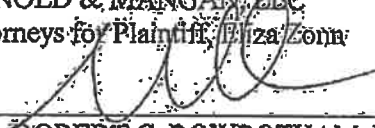
Plaintiff hereby demands that defendant(s) answer Form C and C (1) Interrogatories within the time prescribed by the Court Rules.

CERTIFICATION

Pursuant to R. 4:15-1, I hereby certify that the matter in controversy is not the subject of any other pending or contemplated action or arbitration proceeding. This party is not aware of any other parties who should be joined in this action at this time. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

DATED: April 12, 2019

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorneys for Plaintiff, Eliza Zorn

BY: 
ROBERT C. ROWBOTHAM, II

PHYSICIAN'S CERTIFICATION

A physician's Certification in accordance with N.J.S.A. 39:6A-8a is attached to this Complaint.

EXHIBIT "A"

**CERTIFICATION PURSUANT TO N.J.S.A. 39:6A-8a OF THE
AUTOMOBILE INSURANCE COST REDUCTION ACT OF 1998**

1. I am a licensed physician as defined by N.J.S.A. 45:9-5.1.
2. I am a treating physician to the plaintiff, Eliza Zonn, for injuries sustained on September 7, 2018.
3. All of the opinions set forth herein are within a reasonable degree of medical probability.

4. As a result of the September 7, 2018 accident, Eliza Zonn sustained the following injuries:

- L2-3 annular disc bulge
- L3-L4 disc herniation and annular disc bulge
- L4-L5 disc herniation and annular disc bulge
- C2-C3 disc herniation
- C3-C4 disc herniation and annular disc bulge
- C4-C5 disc herniation and annular disc bulge
- C5-C6 disc herniation and annular disc bulge
- C6-C7 disc herniation and annular disc bulge

5. This certification is based on objective clinical evidence including, but not limited to:

MRI of the Cervical Spine
MRI of the Lumbar Spine
Physical examination

6. Any testing referred to above is not experimental in nature nor are the results of such tests dependent entirely on subjective patient response.

7. Based on my professional expertise and objective clinical evidence including my clinical findings and/or the results of objective medical tests, it is my opinion within a reasonable degree of medical probability that Eliza Zonn has sustained a permanent injury in that Eliza Zonn's has/have not healed to function normally and will not heal to function normally with further medical treatment.

8. I certify under penalty of perjury that the above conclusions are true to the best of my knowledge and belief. I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 14, 2019


VICTOR VERLEZZA, D.C.

BRAMNICK, RODRIGUEZ
ATTORNEYS AT LAW
1827 EAST SECOND STREET
SCOTCH PLAINS, NEW JERSEY 07076



Gallagher Bassett
Attn: Erin Radle, Resolution Manager
P.O. Box 2934
Clinton, IA 52733-2934

21000

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-002822-19

Case Caption: ZONN ELIZA VS MACIASVALDEZ
ARMANDO

Case Initiation Date: 04/15/2019

Attorney Name: ROBERT CHARLES ROWBOTHAM II

Firm Name: BRAMNICK RODRIGUEZ GRABAS ARNOLD &
MANGAN LLC

Address: 1827 E SECOND ST

SCOTCH PLAINS NJ 07076

Phone:

Name of Party: PLAINTIFF : Zonn, Eliza

Name of Defendant's Primary Insurance Company
(if known): Gallagher Bassett

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL
THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same
transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO

Title 59? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

04/15/2019

Dated

/s/ ROBERT CHARLES ROWBOTHAM II

Signed

ESSEX COUNTY - CIVIL DIVISION
SUPERIOR COURT OF NJ
465 MARTIN LUTHER KING JR BLVD
NEWARK NJ 07102

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 776-9300
COURT HOURS 8:30 AM - 4:30 PM

DATE: APRIL 15, 2019
RE: ZONN ELIZA VS MACIASVALDEZ ARMANDO
DOCKET: ESX L -002822 19

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JEFFREY B. BEACHAM

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (973) 776-9300.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: ROBERT C. ROWBOTHAM
BRAMNICK RODRIGUEZ GRABAS ARNO
1827 E SECOND ST
SCOTCH PLAINS NJ 07076

ECOURTS